

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA**

**TINA NICHOLS, an individual,**

**Plaintiff,**

**Case No. 8:19-cv-35**

**v.**

**DEFENDANT'S UNOPPOSED MOTION  
FOR ENLARGEMENT OF TIME**

**FIRST DATA RESOURCES, LLC**

**And**

**JONES LANG LASALLE  
AMERICAS, INC.,**

**Defendants.**

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Defendant, First Data Resources, LLC, pursuant to Fed.R.Civ.P. 6 and NeCivR. 6.1, respectfully requests an extension of time until October 1, 2019 to answer or otherwise respond to the Second Amended Complaint filed by Plaintiff, Tina Nichols. In support of this Motion, Defendant states as follows:

1. On September 3, 2019, Plaintiff filed her Second Amended Complaint (Doc. No. 18).
2. Defendant's Answer to the Second Amended Complaint or other responsive pleading is currently due on September 17, 2019.
3. The Second Amended Complaint names the incorrect Defendant, First Data Resources, LLC. Counsel for Defendant has notified Plaintiff's counsel that the incorrect Defendant is named in the above-captioned action.
4. In order to allow the Parties sufficient time to correct this error, Defendant respectfully requests additional time to prepare and file its Answer to the Second Amended Complaint or otherwise file a responsive pleading.

5. Plaintiff's counsel has indicated that she has no objection to the extension of time for Defendant to file an Answer to the Second Amended Complaint.

6. This Motion has been filed in good faith and is not interposed for purposes of harassment or delay, and no party will be prejudiced by this Court's granting of the same.

WHEREFORE, Defendant respectfully requests the Court to grant an extension until October 1, 2019 to respond to the Second Amended Complaint or file a responsive pleading.

DATED this 17th day of September, 2019.

FIRST DATA RESOURCES, LLC  
Defendant.

/s/ Cody Brookhouser-Sisney  
Cody Brookhouser-Sisney (NE Bar #25872)  
A. Stevenson Bogue (NE Bar #15509)  
McGrath North Mullin & Kratz, PC LLO  
First National Tower, Suite 3700  
1601 Dodge Street  
Omaha, NE 68102  
Phone: 402-341-3070  
Fax: 402-341-0216  
cbrookhouser@mcgrathnorth.com  
sbogue@mcgrathnorth.com

ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

The undersigned hereby certified that on the 17th day of September, 2019, the above and foregoing **Defendant's Unopposed Motion for Enlargement of Time** was filed electronically with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Alexis Mullaney  
Terry White  
CARLSON & BURNETT LLP  
17525 Arbor Street  
Omaha, NE 68130  
alexis@carlsonburnette.com  
terry@carlsonburnette.com

COUNSEL FOR PLAINTIFF

Marnie A. Jensen  
Husch Blackwell LLP  
13330 California St., Ste. 200  
Omaha, NE 68154  
marnie.jensen@huschblackwell.com

ATTORNEY FOR DEFENDANT  
JONES LANG LASALLE AMERICAS, INC.

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/s/ Cody Brookhouser-Sisney  
Cody Brookhouser-Sisney